

DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

RECEIVED

JAN 23 11 47 AM '98

POSTAL RATE COMMISSION  
OFFICE OF THE CONSUMER ADVOCATE

Postal Rate and Fee Changes, 1997 )

Docket No. R97-1

ANSWERS OF THE OFFICE OF THE CONSUMER ADVOCATE  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE  
WITNESS: SHERYDA C. COLLINS (USPS/OCA-T700-1-3)  
(JANUARY 23, 1998)

The Office of the Consumer Advocate hereby submits the answers of Sheryda C. Collins to interrogatories USPS/OCA-T700-1-3, dated January 9, 1998. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,



KENNETH E. RICHARDSON  
Attorney  
Office of the Consumer Advocate

ANSWERS OF OCA WITNESS SHERYDA C. COLLINS  
TO INTERROGATORIES USPS/OCA-T700-1-3

USPS/OCA-T700-1. At page 14, line 8 of your testimony, you indicate that the rates you propose will provide revenues of "approximately \$9 million less" than the Postal Service's proposed rates. Please indicate where in your exhibits you derive the \$9 million revenue differential. If not shown in your exhibits, please show the calculation of this figure.

A.

\$ 58,489,951  
- 49,249,616  
\$ 9,240,335

USPS-T-38, WP-Lib 10, page 2  
OCA Exh. 705, page 2

ANSWERS OF OCA WITNESS SHERYDA C. COLLINS  
TO INTERROGATORIES USPS/OCA-T700-1-3

USPS/OCA-T700-2. Your testimony proposes a rate of \$1.13 for the first pound of Library Rate Mail.

- a. Why did you select this rate?
- b. Did you consider others?
- c. Please show all calculations used in reaching your decision to select this rate.

A. a.-c. Witness Adra set the rate for the first pound at one cent over his calculated costs. (See USPS-T-38, WPs - Lib 4, page 2 and Lib 5, page 1.) This rate is one cent over the costs shown in OCA-Exh. 701. Also, in the formula used to determine the rates, increases to the first pound rate cause the other pound rates to decrease. I looked at several other possible rates; however, no copies of these runs were saved. I believe that \$1.15 was one I tried. I concluded that the rates proposed in the testimony produced the best results under the circumstances, i.e., a small increase in the first pound rate and small to moderate decreases in the other pound rates.

ANSWERS OF OCA WITNESS SHERYDA C. COLLINS  
TO INTERROGATORIES USPS/OCA-T700-1-3

USPS/OCA-T700-3. Please confirm that, as mandated by law, the cost coverage relationship between Library Rate and Standard B Special Rate is different than that between Classroom and Nonprofit Rates. If you do not confirm, please explain fully.

A. Confirmed. See my testimony at footnote 1, page 4; page 7, lines 10 - 11; page 7, lines 14 - 15; page 8, lines 3 - 15; page 10, lines 6 - 8; page 11, lines 18 - 19; and page 11, lines 20 -23.

## DECLARATION

I, Sheryda C. Collins, declare under penalty of perjury that the answers to interrogatories USPS/OCA-T700-1-3 of the United States Postal Service are true and correct, to the best of my knowledge, information and belief.

Executed January 23, 1998

Sheryda C. Collins

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

  
KENNETH E. RICHARDSON  
Attorney

Washington, DC 20268-0001  
January 23, 1998